

SCREENING SITE INSPECTION IMPLEMENTATION PLAN FOR

FLEXI VAN LEASING (GENERAL DIESEL)

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NERAP

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1.0 Introduction

1.1 Confidentiality

THIS DOCUMENT IS CONFIDENTIAL. Due to the predecisional nature of the contained information, this document and its attachments are not to be released without prior approval of the U.S. Environmental Protection Agency (USEPA).

1.2 Preparation

This implementation plan (IP) has been prepared by B&V Waste Science and Technology Corp. (BVWST) under the ARCS contract with the USEPA (No. 68-W8 -0064).

1.3 Objectives

The objectives of this implementation plan are:

- 1. determining CERCLA eligibility;
- 2. documenting the presence, quantity, and type, or absence of uncontained or uncontrolled hazardous substances on site; and
- 3. determining area and site characteristics.

1.4 Quality Assurance/Quality Control

Unless otherwise stated, QA/QC protocol for the site inspection activities is documented in the Quality Assurance Project Plan for Region V Superfund Site Assessment Program - September 27, 1991.



2.0 Site History

This section of the implementation plan presents information pertaining to the history of the site, including site operations, storage/disposal methods, areas of concern and current status. The site is located at 2200 Higgins Road, Elk Grove Village, in the NE 1/4, NW 1/4 of Section 36, Township 41 North, Range N. East in Cook County, Illinois, as shown in Figure 1 located in Section 2.

2.1 Site Operations

Flexi Van Leasing (Flexi Van) owned and maintained a semi-trailer storage facility at 2200 Higgins Road, Elk Grove Village, Cook County, Illinois. Trailers were parked in an open lot, exposing them to the weather. Film Recovery Systems (FRS) of Elk Grove Village had stored at the facility up to 20 trailers which FRS leased from J. Fiorito Leasing, Ltd.

FRS-leased trailers at the Flexi Van facility were found to be filled or partially filled with cyanide contaminated plastic chips. The chips were generated by FRS as a waste product in a silver recovering process. Photographic and x-ray negatives were cut to dime size pieces (chips), exposed to cyanide solution to recover the silver in the negatives, and then washed in a cyanide destruct solution containing sodium hypochlorite prior to shipment from the FRS processing plant to storage trailers at facilities in the Cook County area. Flexi Van is one of several facilities to receive FRS trailers. FRS reported to the IEPA that the chips have approximately 30 ppm cyanide after processing. Trace amounts of residual silver may also be present.

2.2 Storage/Disposal Methods

Cyanide chip laden trailers at the Flexi Van facility were stored on an open lot. A joint inspection by IEPA and the Illinois Attorney General's Office in April 1983 found seven FRS trailers at Flexi Van. The trailers were partially filled with cyanide



contaminated film chips. The trailers, one of which was an open top semi-trailer "dump truck", were not locked.

In July 1983, a state funded emergency action was conducted at this site in which the trailers were decontaminated and the contents removed to a former strip mine near Canton, Illinois.

2.3 Areas of Concern

Discreet surface areas (soil) where FRS trailers were parked are the primary areas of concern. IEPA reports in the Preliminary Assessment (PA) that film chips were laying on the ground around the trailers. Subsequent chip dispersal by wind and surface water runoff may render more of the facility and adjacent vicinity as an area of concern.

Leachate from the trailers and chips laying on the ground have potential for dispersion by surface water runoff.

Infiltration of cyanide leachate into local groundwater reservoirs is not a primary concern. The PA notes it is unlikely potential contamination would reach the groundwater table.

2.4 Current Status

The IEPA reported that the site was cleaned up in 1983 in a state funded emergency action. The site has been assigned a low priority by the IEPA due to the lack of potential gross contamination.

A truck repair service, General Diesel, now operated on the site. General Diesels primary function is to repair semi-tractors and trailers, but also leases some space for trailer storage.

3.0 Reconnaissance Findings and Observations

On September 5, 1991, BVWST conducted a site reconnaissance of the General Diesel Site in Elk Grove Village, Illinois. The BVWST inspection team consisted of Ramona Reints and Miguel Sanchez. The General Diesel facility representative interviewed was Mr. Andy Applian, who is also the owner of the property. The sky was clear and sunny, the winds were calm, and the temperature was approximately 70°F on the day of the reconnaissance.

The reconnaissance for this site began at 9:45 a.m. The inspection team first gave Mr. Applian a brief description of the purpose for the reconnaissance and then proceeded to gather information on a question-and-answer basis. The following paragraphs summarize the results of the reconnaissance.

Mr. Applian stated the property was purchased in 1975 or 1976 and is currently paying on a mortgage to Talman Bank. Mr. Applian operates a company named General Diesel on the site. General Diesel repairs trucks and has limited trailer and equipment storage. Mr. Applian claims to have no knowledge of Flexi Van Leasing. The site is still active, but according to Mr. Applian, business is slow and he is the only person currently working there.

No evidence was observed of CERCLA regulated substances ever being present nor is there any monitoring being done at this site. According to Mr. Applian, only one trailer containing cyanide contaminated plastic chips was ever located at the site. He stated that the trailer broke down near the intersection of Oakton and Higgins Road and was hauled to his property and deposited there without his permission. This incident occurred after work hours. Following an inspection by EPA officials, a fence was erected around the trailer and a 24-hour security guard was posted. A few weeks later, the trailer was removed by EPA and a truck with a vacuum was used to clear

the site of any chips. Mr. Applian has no analytical information for the site. He stated he attended court proceedings regarding the cyanide chip incident and that those records may provide us with additional information. He does not have any court records.

There are no fences or other barriers to restrict access to the property from the outside. Vehicular access to the property is via a driveway connecting the lot to Higgins Road. A gate is located at the driveway entrance to control access, but it is maintained open at all times.

There is one building on the site. It is approximately 65 feet by 60 feet and is used as a truck repair garage. Mr. Applian stated that he had this garage constructed when he bought the property. Power lines run along the south side of the facility adjacent to Higgins Road. Underground gas and water service lines run from the garage out to the main supply line along Higgins Road. No other structures are located on the site.

There is an asphalt parking lot in the southeastern section of the site, between the garage and Higgins Road. A driveway is located in this area for vehicular access. The surface of the rest of the site, outside of the building, consists of gravel and sparse vegetation. There are no other transportation facilities in the vicinity of the site.

The General Diesel property is relatively flat with a slight southeasterly slope. Surface drainage is towards the southeast corner of the property. A small hill is located west of the facility on adjacent property. Mr. Applian stated that the hill was formed during clearing and excavation activities for a proposed building on the neighboring property, but the building was never erected. There are no water table indicators (ponds, streams, wetlands) on the surface, nor are there any surface water drainage control devices.

Land in the vicinity is primarily used for commercial purposes. However, the land immediately surrounding the General Diesel site on the south, east, and west sides is undeveloped. This land contains trees and vegetation. Directly south of the site, across Higgins Road, is a State Commercial Drivers License Truck/Bus Testing Center.

There were no manufactured containers on site at the time of the reconnaissance which contained CERCLA regulated substances. However, semi-trailers can potentially be used to store hazardous substances. Three trailers were parked on site of the time of the site reconnaissance. Several trucks and construction equipment were also stored in the north and southwestern sections of the site. No evidence of releases to the environment were observed.

General Diesel has a potable water source, a tap water hookup, an accessible on-site telephone, a fire extinguisher hanging on the wall, a garbage service, and toilets which can be used by BVWST workers when on-site. Mr. Applian has no objection to the use of radio communication on site.

Mr. Applian then gave the inspection team a tour of the site. During this tour, Mr. Applian stated that a maximum of 10 to 14 trailers could be parked on-site at any one time. Photographs of the entire site were taken during the tour. The tour ended at approximately 11:40 a.m. The inspection team then thanked Mr. Applian and left the site.

4.0 Justification for an SSI

This segment of the implementation plan presents information supporting the need to conduct an SSI, including the threat posed to specific pathways and the population/environments potentially affected.

4.1 Supporting Information

The IEPA Preliminary Assessment (PA) of the Flexi Van facility assigns a low priority to the site, citing a lack of gross contamination. Possible soil contamination is confirmed in the PA. Possible surface water contamination is acknowledged by the PA but localized by the apparent lack of runoff from the site. Potential contamination of groundwater at the site is deemed unlikely in the PA.

4.2 Pathways Threatened

Apparent threatened pathways are principally limited to soil and surface water. Contaminant migration to groundwater is conceivable but unlikely. People and animals may be exposed to potentially contaminated material by direct contact.

When the FRS trailers were onsite, discolored soil was observed around them and where chips were strewn on the ground. Possible soil contamination may have occurred where leachate from the trailers and chips in rain filled depressions was absorbed into the soil.

Surface water runoff may have carried cyanide contaminated chips offsite. However, no offsite migration by surface runoff was noted in the IEPA report.

People working in the area may be at risk through directly contacting potentially contaminated material. Direct contact by the public is prohibited by a fence bordering the property.

4.3 Populations/Environments Potentially Affected

The Flexi Van facility is an industrialized area within a densely populated urban area. Communities within a three-mile radius of the facility (Des Plaines, Bensenville, Wood Dale, Elk Grove Village, Arlington Heights and Mount Prospect) obtain drinking water from deep wells (over 1,400 ft.) owned by the individual communities. Industrial water is also obtained in this manner. Threat to water sources of local communities and industry is low due to the low probability of groundwater contamination and the great depth from which groundwater is drawn. There are no known critical habitats in the area.

5.0 Proposed Sampling Plan

Sampling recommendations are developed to obtain needed information. The samples will be tested for cyanide. Sample locations and/or number of samples can be changed or eliminated by the field team leader because of site conditions existing during site inspection. The reason for any change or elimination will be documented by a change request and approved by the project manager.

5.1 Soil

A total of four soil samples will be collected at the Flexi Van site. The soil samples will be taken in areas where the film chip laden trailers were, or are suspected to have been, parked. Samples will be collected from discolored soil in these areas. One soil sample will be collected in the southeast corner of the site to assess the potential for surface water transport of cyanide off the site. Samples from these areas will evaluate for presence of possible cyanide contamination in areas where chips and leachate were observed on the ground. One background sample will be taken in an area of the site with no or little potential for exposure to cyanide chips.

6.0 Work Summary

The specific tasks to be completed during the screening site inspection are indicated below:

- 1. Interview site owner(s) representative(s).
- 2. Photograph the site and surrounding area.
- 3. Screen the site with detection devices for substance occurrence and safety information.
- 4. Collect a suite of environmental samples.
- 5. Dispose of investigative derived waste.

The health and safety protocol, which is detailed in the Site Health and Safety Plan (HASP), will be followed during the SI. We anticipate that workers will be properly protected using these Personal Protective Equipment (PPE) levels during the tasks or portions thereof:

<u>Task</u>	Anticipated Level
1	 D
2	 D
3	 D
4	 D
5	 D

When performing the indicated task, the field team will be prepared to advance to the next level of personal protection above that listed.

7.0 Estimate of LOE Hours

1. Number of field team members:

Reconnaissance team is two persons.

Field sampling team is five persons.

2. Number of days for field work (actual onsite activities):

One day is allotted for reconnaissance/interview.

Two-and-one-half days are allotted for sampling.

3. Estimated Level of Effort (in person - hours)

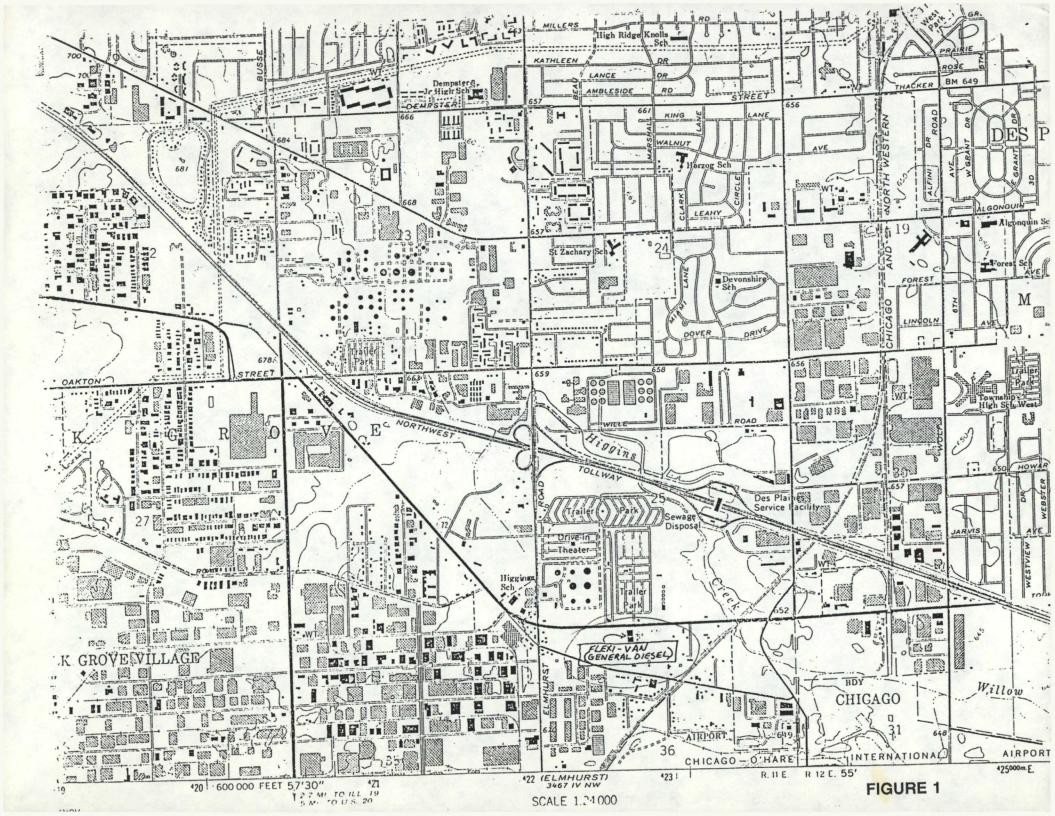
a.	Pre Field Work:	100
b.	Travel:	16
c.	Field work:	118
d.	Post Field Work:	30
e.	Report Preparation:	<u>152</u>
	TOTAL:	416

8.0 Projected Schedule of Milestones

Milestone	Begin	Complete
Pre-Field Work	8/07/91	10/11/91
Travel/Field Work	8/18/91	11/22/91
Post-Field Work	11/25/91	12/27/91
Report Preparation	12/02/91	3/27/92

SECTION TWO

FIGURES



SECTION THREE REFERENCES

- 1. Corkill, K.W. IEPA memorandum to USEPA, April 1987.
- 2. Potential Hazardous Waste Site Preliminary Assessment. Flexi Van Leasing (General Diesel), IEPA, February 1987.
- 3. Sternard, G. IEPA memorandum to files. April 1983.